



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 10, 2024

Via FedEx

Rachel Kull, Esq.
MDC Brooklyn
Metropolitan Detention Center
Attn: Legal Department
80 29th Street
Brooklyn, NY 11232

Re: *United States v. Darius Paduch, 23 Cr. 181 (RA)*

Dear Ms. Kull:

Please find enclosed a hard drive containing certain discovery materials in this case. Pursuant to the attached order, the Government respectfully requests that you keep this hard drive with the defendant's laptop:

**Darius Paduch
53470-510**

Please do not hesitate to contact us should you have any questions.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: _____s/
Marguerite Colson
Assistant United States Attorney
(212) 637-2587

Grayson Glogoff
Paralegal
(212) 637-2339

8/26/24, 1:25 PM

Mabalaw.com Mail - Hard Drive - Laptop Update



Jeffrey Hawriluk <jhawriluk@mabalaw.com>

Hard Drive - Laptop Update

Jeffrey Hawriluk <jhawriluk@mabalaw.com>

Mon, Apr 22, 2024 at 9:59 AM

To: "Glogoff, Grayson (USANYS) [Contractor]" <Andrew.Glogoff@usdoj.gov>

Cc: Michael Baldassare <mbaldassare@mabalaw.com>, Jennifer Mara <jmara@mabalaw.com>, "Colson, Marguerite (USANYS)" <Marguerite.Colson@usdoj.gov>, "Espinosa, Elizabeth (USANYS)" <Elizabeth.Espinosa@usdoj.gov>, "Qian, Ni (USANYS)" <Ni.Qian@usdoj.gov>, "Xiang, Jun (USANYS)" <Jun.Xiang@usdoj.gov>, "Vuckovich, Mia (USANYS) [Contractor]" <Mia.Vuckovich@usdoj.gov>

Thanks

On Mon, Apr 22, 2024 at 9:58 AM Glogoff, Grayson (USANYS) [Contractor] <Andrew.Glogoff@usdoj.gov> wrote:

Hi Jeff,

Tracking information below:

Tracking number: 818241074755

DELIVERED

Friday

4/12/24 at 11:09 AM

Your package was released as requested and safely delivered.

Signed for by: Signature release on file

[↓ Obtain proof of delivery](#)

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

MORE OPTIONS

DELIVERY STATUS

Delivered ✓

[Report missing package](#)

TRACKING ID

818241074755 ✎ ☆

FROM

NEW YORK, NY US

NEW YORK, NY

4/11/24 6:36 PM

ON THE WAY

BROOKLYN, NY

4/12/24 8:47 AM

OUT FOR DELIVERY

BROOKLYN, NY

4/12/24 8:57 AM

DELIVERED

BROOKLYN, NY US

Delivered

4/12/24 at 11:09 AM

[↓ View travel history](#)

From: Jeffrey Hawriluk <jhawriluk@mabalaw.com>

Sent: Monday, April 22, 2024 9:54 AM

To: Michael Baldassare <mbaldassare@mabalaw.com>

Cc: Glogoff, Grayson (USANYS) [Contractor] <AGlogoff@usa.doj.gov>; Jennifer Mara <jmara@mabalaw.com>; Colson, Marguerite (USANYS) <MColson@usa.doj.gov>; Espinosa, Elizabeth (USANYS) <EEspinosa@usa.doj.gov>; Qian, Ni (USANYS) <NQian@usa.doj.gov>; Xiang, Jun (USANYS) <JXiang@usa.doj.gov>; Vuckovich, Mia (USANYS)

8/26/24, 1:25 PM

Mabalaw.com Mail - Hard Drive - Laptop Update

[Contractor] <MVuckovich@usa.doj.gov>

Subject: Re: [EXTERNAL] Re: Hard Drive - Laptop Update

Hi Grayson:

Was the hard drive sent with tracking? I am sure it was delivered, but want to make sure before I bug anyone at MDC, as Darius has not received the updated discovery.

Thanks

On Thu, Apr 11, 2024 at 11:36 AM Michael Baldassare <mbaldassare@mabalaw.com> wrote:

Thank you Grayson.

On Thu, Apr 11, 2024, 11:19 AM Glogoff, Grayson (USANYS) [Contractor] <Andrew.Glogoff@usdoj.gov> wrote:

Hello,

A copy of the discovery sent to your client is now available to you via USAfx.

Thank you,

Grayson

From: Jeffrey Hawriluk <jhawriluk@mabalaw.com>

Sent: Wednesday, April 10, 2024 7:33 PM

To: Glogoff, Grayson (USANYS) [Contractor] <AGlogoff@usa.doj.gov>

Cc: Michael Baldassare <mbaldassare@mabalaw.com>; Jennifer Mara <jmara@mabalaw.com>; Colson, Marguerite (USANYS) <MColson@usa.doj.gov>; Espinosa, Elizabeth (USANYS) <EEspinosa@usa.doj.gov>; Qian, Ni (USANYS) <NQian@usa.doj.gov>; Xiang, Jun (USANYS) <JXiang@usa.doj.gov>; Vuckovich, Mia (USANYS) [Contractor] <MVuckovich@usa.doj.gov>

Subject: Re: [EXTERNAL] Re: Hard Drive - Laptop Update

Grayson:

Checking in to make sure you received the new hard drive and the status of it being sent to MDC.

Thanks,

Jeff Hawriluk

On Wed, Apr 3, 2024 at 11:27 AM Glogoff, Grayson (USANYS) [Contractor] <Andrew.Glogoff@usdoj.gov> wrote:

Hi Jeff,

BP-A0331

AUTHORIZATION TO RECEIVE PACKAGE OR PROPERTY CDFRM

JUN 10

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

Name and Address of Person Sending Package			EXPIRATION DATE	
Name			<div style="border: 1px solid black; padding: 2px; text-align: center;">N/A</div> This Authorization Is Not Valid After The Date Shown.	
Legal Department				
Address			Enter Inmate Name, Register No., and Institution Address Here: DARIUS PADUCH REG # 53470-510	
MDC Brooklyn				
80 29 th Street				
City	State	Zip Code		
Brooklyn	NY	11232		

THE NAMED INMATE IS AUTHORIZED TO RECEIVE (specify below):

You are authorized to send the following personal property. PLEASE NOTE: Including unauthorized materials in the package will result in the entire package being returned undelivered.

QUANTITY	ITEM AND DESCRIPTION (INCLUDED STATED VALUE)	DISPOSITION
1	USB CORD	
1	HARD DRIVE (1345) (B)	
	THIS FORM MUST REMAIN IN YOUR POSSESSION WHILE	
	UTILIZING THE EQUIPMENT	

ENTER SIGNATURE, TITLE AND DATE OF APPROVING OFFICIAL - APPROVING OFFICIAL ALSO ENTERS EXPIRATION DATE, above.

LEWIS/LEGAL

4/15/2024

(Signature and Title)

(Date Approved)

INSPECTION AND RECEIPT

Completed by Inspecting Staff

Status/Condition of Property Received:

Inspected and cleared for issue:

LEWIS

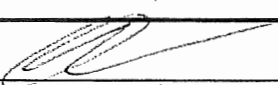
4/15/2024

(Staff Signature)

(Date)

DARIUS PADUCH, REG # 53470-510

(Inmate Signature Upon Receipt)


 8/21/24
 (Date)

The Original, Copy 1 and Copy 2 remain together until fully completed. Copy 3 and Copy 4 are forwarded to addressee by inmate.
Original- Central File; Copy 1- R&D Property File; Copy 2- Inmate; Copy 3- Addressee to keep; Copy 4- Addressee place in package

8/30/24, 9:07 PM

Mabalaw.com Mail - Paduch - Laptop/Hard Drive



Jeffrey Hawriluk <jhawriluk@mabalaw.com>

Paduch - Laptop/Hard Drive

Papapetru, Sophia (BOP) <spapapetru@bop.gov>

Tue, Apr 30, 2024 at 11:07 AM

To: Jeffrey Hawriluk <jhawriluk@mabalaw.com>, "Kull, Rachel (BOP)" <rkull@bop.gov>, "Chan, Irene (BOP)" <ichan@bop.gov>

Cc: Michael Baldassare <mbaldassare@mabalaw.com>

We do not upload discovery for the inmates. You can mail the hard drive to the attention of the legal department and we will log it, then provide it to the inmate.

From: Jeffrey Hawriluk <jhawriluk@mabalaw.com>

Sent: Friday, April 26, 2024 1:43 PM

To: Kull, Rachel (BOP) <rkull@bop.gov>; Chan, Irene (BOP) <ichan@bop.gov>; Papapetru, Sophia (BOP) <spapapetru@bop.gov>

Cc: Michael Baldassare <mbaldassare@mabalaw.com>

Subject: [EXTERNAL] Re: Paduch - Laptop/Hard Drive

Hello:

Reaching out regarding the new hard drive for Paduch, was this uploaded to his laptop?

Thank you,

Jeff Hawriluk

On Mon, Apr 22, 2024 at 10:09 AM Jeffrey Hawriluk <jhawriluk@mabalaw.com> wrote:

Hello:

Reaching out on a separate issue. The USAO sent over a hard drive to be uploaded to Darius Paduch's discovery laptop. They provided me with the tracking : 818241074755 (FedEx). It appears that it was delivered on 4/12. I do not believe the discovery was uploaded to the laptop, but can someone please check on the status?

Thank you very much for your help.

--

Jeffrey Hawriluk, Esq.

8/30/24, 9:07 PM

Mabalaw.com Mail - Paduch - Laptop/Hard Drive

Baldassare & Mara, LLC

75 Livingston Ave., Suite 101

Roseland, NJ 07068

Office: 973-200-4066

Fax: 973-556-1071

--

Jeffrey Hawriluk, Esq.

Baldassare & Mara, LLC

75 Livingston Ave., Suite 101

Roseland, NJ 07068

Office: 973-200-4066

Fax: 973-556-1071



U.S. DEPARTMENT OF JUSTICE
Federal Bureau of Prisons
Metropolitan Detention Center

80 29th Street
Brooklyn, New York 11232

United States v. Paduch, 23-CR-181

Register No. 53470-510

Date	Accepted	Refused	Time Left to VR	Time Returned from VR	Inmate Signature
04/02/2024	✓		10 ⁰⁰ AM	500 PM	S. Paduch
04/03/2024	✓		136 PM	700 PM	S. Paduch
04/04/2024	✓		130 PM	6:30 PM	S. Paduch
04/05/2024	✓		12:00 PM	7:30 PM	S. Paduch
04/08/2024	✓		8:30 AM	2:30 PM	S. Paduch
04/09/2024	✓		8:30 AM	2:30 PM	S. Paduch
04/10/2024	✓		12:00 PM	7:30 PM	S. Paduch
04/11/2024	✓		10:00 AM	3:30 PM	S. Paduch
04/12/2024	✓		9:00 AM		



U.S. DEPARTMENT OF JUSTICE
Federal Bureau of Prisons
Metropolitan Detention Center

802511st Street
Brooklyn, New York 11232

United States v. Paduch. 23-CR-181
Register No. 53470-510

Date	Accepted	Refused	Time Left to VR	Time Returned from VR	Inmate Signature
04/15/2024	✓		9 ⁰⁰ AM	6 PM	
04/16/2024	✓		1030 AM	3:30 PM	
04/17/2024	IN COURT	IN COURT	IN COURT	IN COURT	IN COURT
04/18/2024	✓		8:30 AM	3:30 PM	
04/19/2024	✓		8:05 AM	3:30 PM	
04/22/2024	✓		8:15 AM	3:30 PM	
04/23/2024	✓		8:15 AM	3:30 PM	
04/24/2024	IN COURT	IN COURT	IN COURT	IN COURT	
04/25/2024					
04/26/2024					



Jeffrey Hawriluk <jhawriluk@mabalaw.com>

RE: 1:23-cr-00181-RA USA v. PADUCH -- April 8, 2024 Log

Kull, Rachel (BOP) <rkull@bop.gov>

Fri, Apr 12, 2024 at 3:38 PM


To: "Abrams_NYSDChambers@nysd.uscourts.gov" <Abrams_NYSDChambers@nysd.uscourts.gov>

Cc: "Espinosa, Elizabeth (USANYS)" <Elizabeth.Espinosa@usdoj.gov>, "Qian, Ni (USANYS)" <Ni.Qian@usdoj.gov>, "Xiang, Jun (USANYS)" <Jun.Xiang@usdoj.gov>, Michael Baldassare <mbaldassare@mabalaw.com>, Jeffrey Hawriluk <jhawriluk@mabalaw.com>, "Colson, Marguerite (USANYS)" <Marguerite.Colson@usdoj.gov>, "dstern@rssslaw.com" <dstern@rssslaw.com>, Jennifer Mara <jmara@mabalaw.com>, "Papapetru, Sophia (BOP)" <spapapetru@bop.gov>, "Chan, Irene (BOP)" <ichan@bop.gov>

Good afternoon:

Please see the attached log documenting Mr. Paduch's discovery access for today, April 12, 2024. Thank you!

[Quoted text hidden]

 **Paduch - 4.12.24.pdf**
54K



Jeffrey Hawriluk <jhawriluk@mabalaw.com>

RE: 1:23-cr-00181-RA USA v. PADUCH -- April 8, 2024 Log

Chan, Irene (BOP) <ichan@bop.gov>

Wed, Apr 17, 2024 at 2:11 PM

To: "Xiang, Jun (USANYS)" <Jun.Xiang@usdoj.gov>, "Papapetru, Sophia (BOP)" <spapapetru@bop.gov>, Jeffrey Hawriluk <jhawriluk@mabalaw.com>, "Kull, Rachel (BOP)" <rkull@bop.gov>

Cc: Michael Baldassare <mbaldassare@mabalaw.com>, "Abrams_NYSDChambers@nysd.uscourts.gov" <Abrams_NYSDChambers@nysd.uscourts.gov>, "Espinosa, Elizabeth (USANYS)" <Elizabeth.Espinosa@usdoj.gov>, "Qian, Ni (USANYS)" <Ni.Qian@usdoj.gov>, "Colson, Marguerite (USANYS)" <Marguerite.Colson@usdoj.gov>, "dstern@rsslslaw.com" <dstern@rsslslaw.com>, Jennifer Mara <jmara@mabalaw.com>

Good Afternoon,

Please see attached log.

Thank you.

Irene Chan | Staff Attorney

U.S. Department of Justice | Federal Bureau of Prisons

CLC New York

80 29th Street


Brooklyn, New York 11232

P: 718-840-4746

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 **Paduch - 4.16.24.pdf**
106K



Jeffrey Hawriluk <jhawriluk@mabalaw.com>

RE: 1:23-cr-00181-RA USA v. PADUCH -- April 8, 2024 Log

Xiang, Jun (USANYS) <Jun.Xiang@usdoj.gov>

Mon, Apr 22, 2024 at 5:52 PM

To: Abrams NYSD Chambers <Abrams_NYSDChambers@nysd.uscourts.gov>, Michael Baldassare <mbaldassare@mabalaw.com>, Jennifer Mara <jmara@mabalaw.com>, Jeffrey Hawriluk <jhawriluk@mabalaw.com>, Derek Miller <dmiller@mabalaw.com>

Cc: "Colson, Marguerite (USANYS)" <Marguerite.Colson@usdoj.gov>, "Espinosa, Elizabeth (USANYS)" <Elizabeth.Espinosa@usdoj.gov>, "Qian, Ni (USANYS)" <Ni.Qian@usdoj.gov>

From: Chan, Irene (BOP) <ichan@bop.gov>

Sent: Friday, April 19, 2024 1:33 PM

To: Xiang, Jun (USANYS) <JXiang@usa.doj.gov>; Papapetru, Sophia (BOP) <spapapetru@bop.gov>; Kull, Rachel (BOP) <rkull@bop.gov>

Cc: Espinosa, Elizabeth (USANYS) <EEspinosa@usa.doj.gov>; Qian, Ni (USANYS) <NQian@usa.doj.gov>; Colson, Marguerite (USANYS) <MColson@usa.doj.gov>

Subject: RE: [EXTERNAL] RE: 1:23-cr-00181-RA USA v. PADUCH -- April 8, 2024 Log

Good Afternoon,

Please see attached.

I do not have today's updated roster.

Thank you.

Irene Chan | Staff Attorney

U.S. Department of Justice | Federal Bureau of Prisons

CLC New York

80 29th Street

Brooklyn, New York 11232

P: 718-840-4746

D11

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From: Xiang, Jun (USANYS) <JXiang@usa.doj.gov>

Sent: Friday, April 19, 2024 1:02 PM

To: Chan, Irene (BOP) <ichan@bop.gov>; Papapetru, Sophia (BOP) <spapapetru@bop.gov>; Kull, Rachel (BOP) <rkull@bop.gov>

Cc: Espinosa, Elizabeth (USANYS) <EEspinosa@usa.doj.gov>; Qian, Ni (USANYS) <NQian@usa.doj.gov>; Colson, Marguerite (USANYS) <MColson@usa.doj.gov>

Subject: RE: [EXTERNAL] RE: 1:23-cr-00181-RA USA v. PADUCH -- April 8, 2024 Log

Dropping defense and Court. BOP Team—just a friendly reminder to please continue sending logs from this week. We know the defendant was in court Wednesday, but he should have been afforded access yesterday and today. Thanks!

Jun

[Quoted text hidden]

 **4.18.24.pdf**
118K



Jeffrey Hawriluk <jhawriluk@mabalaw.com>

RE: 1:23-cr-00181-RA USA v. PADUCH -- April 8, 2024 Log

Kull, Rachel (BOP) <rkull@bop.gov>

Tue, Apr 23, 2024 at 8:08 AM

To: Michael Baldassare <mbaldassare@mabalaw.com>, "Xiang, Jun (USANYS)" <Jun.Xiang@usdoj.gov>

Cc: "Papapetru, Sophia (BOP)" <spapapetru@bop.gov>, Jeffrey Hawriluk <jhawriluk@mabalaw.com>, Abrams NYSD Chambers <Abrams_NYSDChambers@nysd.uscourts.gov>, "Espinosa, Elizabeth (USANYS)"

<Elizabeth.Espinosa@usdoj.gov>, "Qian, Ni (USANYS)" <Ni.Qian@usdoj.gov>, "Colson, Marguerite (USANYS)"

<Marguerite.Colson@usdoj.gov>, David Stern <dstern@rssslaw.com>, Jennifer Mara <jmara@mabalaw.com>, "Chan, Irene (BOP)" <ichan@bop.gov>

Good morning all:

Please see the attached log documenting Mr. Paduch's discovery access. Thank you!

Warmest regards,

Rachel Kull | Staff Attorney

U.S. Department of Justice

Federal Bureau of Prisons

MDC Brooklyn | MCC New York | FCI Otisville

CLC New York

80 29th Street

Brooklyn, New York 11232

P: (718) 840-4200

E: rkull@bop.gov**From:** Michael Baldassare <mbaldassare@mabalaw.com>**Sent:** Wednesday, April 17, 2024 1:56 PM**To:** Xiang, Jun (USANYS) <JXiang@usa.doj.gov>

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[Quoted text hidden]

4.22.24.pdf
91K



Jeffrey Hawriluk <jhawriluk@mabalaw.com>

RE: 1:23-cr-00181-RA USA v. PADUCH -- April 8, 2024 Log

Kull, Rachel (BOP) <rkull@bop.gov>

Wed, Apr 24, 2024 at 3:37 PM

To: Michael Baldassare <mbaldassare@mabalaw.com>, "Xiang, Jun (USANYS)" <Jun.Xiang@usdoj.gov>

Cc: "Papapetru, Sophia (BOP)" <spapapetru@bop.gov>, Jeffrey Hawriluk <jhawriluk@mabalaw.com>, Abrams NYSD Chambers <Abrams_NYSDChambers@nysd.uscourts.gov>, "Espinosa, Elizabeth (USANYS)"

<Elizabeth.Espinosa@usdoj.gov>, "Qian, Ni (USANYS)" <Ni.Qian@usdoj.gov>, "Colson, Marguerite (USANYS)"

<Marguerite.Colson@usdoj.gov>, David Stern <dstern@rsslaw.com>, Jennifer Mara <jmara@mabalaw.com>, "Chan, Irene (BOP)" <ichan@bop.gov>

Good afternoon:

Please see the attached discovery log. Thank you!

[Quoted text hidden]

**4.24.24.pdf**

329K